

REMARKS

Status of Claims

No claims have been amended, cancelled, or added, thus, claims 1-17 and 19 remain pending for reconsideration. Applicants assert that no new matter has been added.

Rejection under 35 U.S.C. § 102(b)

On page 2, item 3, the Office Action rejected claims 1, 3 and 5-12 under 35 U.S.C. § 102(b) as being anticipated by Non-Patent Literature titled "Recommend-it.com: Spread the Word!!" (hereinafter Recommend-it.com). This rejection is respectfully traversed.

On page 2, third paragraph of item 3, the Office Action alleges that Recommend-it.com teaches:

The introduction origin system comprising an introducing part for notifying the introduction destination system for "introducing" information containing user entry information of the introduction target system (i.e. the first user (introduction origin) recommends a second user (introduction target) to the Recommend-it.com site (introduction destination system) (see page 2).

Applicants disagree that the introduction origin system, the introduction target system, and the introduction destination system of the present invention correspond to the first user, second user, and the Recommend-it.com website respectively, as asserted by the Office Action.

For example, in the present invention of claim 1, e.g. by, the embodiment of Figure 9 and described in the Specification page 16, the user of the introduction origin system 100 is "Okuyama," the user of the introduction destination system 200 is "Iwakawa," and the user entity of the introduction target system 300 is "Supermarket a." Thus, when "Okuyama" (introduction origin) wants to *introduce* "Supermarket a" (introduction target) to "Iwakawa" (introduction destination), Okuyama uses the buddy list interface to drag and drop Supermarket a to Iwakawa. In other words, Supermarket a is what is being introduced to a second user.

On the other hand, Recommend-it.com describes that a first user recommends or "introduces" a website to a second user through the Recommend-it.com interface. In Recommend-it.com, if the first user wants to recommend a visited website, the first user enters the second user's email address in the online form. The Recommend-it.com site then forwards an email to the second user indicating that the first user has recommended (i.e. introduced) the visited website. In the example described on page 2-4 of Recommend-it.com, the first user (Eileen Velet) recommends the "WebDeck Software" website to a second user (David Ho) by entering David Ho's email address (david_ho@digidem.com). In other words, what is being

introduced in Recommend-it.com is the WebDeck Software website.

The Office Action, however, as described above, equates the second user in Recommend-it.com with the introduction target (Supermarket α) of the present invention. The second user in Recommend-it.com is merely the receipt of the recommended website and is not itself recommended or introduced. Accordingly, the Recommend-it.com website (introduction destination as alleged by Office Action) itself does not register the second user on a user list. This is not surprising because the Recommend-it.com website merely forwards an email to the second user and does not maintain a user list as described in the present application. Accordingly, Recommend-it.com fails to describe the feature of the "introduction destination system comprising a registering part... registering user entry information of the introduction target system on a user list" as recited by claim 1.

Alternatively, the introduction target system of the present invention as set forth in claim 1 and as described above, would more appropriately be equated to the WebDeck Software website of Recommend-it.com because the WebDeck Software website is what is being recommended or introduced. Under this alternate interpretation, the first user corresponds to the introduction origin, the WebDeck Software website to the introduction target, and the Recommend-it.com website to the introduction destination. However, because Recommend-it.com merely forwards an email to the second user and does not register users on a user list, Recommend-it.com fails to describe "the introduction destination system comprising... a notifying part... notifying the introduction target... that a registration action based on introduction has been conducted" as recited by claim 1. Moreover, in Recommend-it.com, the WebDeck software website is not made aware that it has been recommended or introduced, and therefore, the WebDeck software website fails to describe the "introduction target system comprising an introduced recognizing part receiving introduced information from the introduced information notifying part of the introduction destination system and recognizing a registration action to the user list in the introduction destination system" as recited by claim 1.

Recommend-it.com fails to describe the features of claim 1 as described above, and therefore, Applicants submit that claim 1 patentably distinguishes over the cited art. Claims 3 and 5-12 inherit the patentable recitations of claim 1, from which they depend, and therefore, patentably distinguish over the cited art.

In view of the above, Applicants respectfully request the rejection be withdrawn.

Rejection under 35 U.S.C. § 103(a)

On page 4, item 4, the Office Action rejected claims 2, 4, 14-17 and 19 as being unpatentable over Recommend-it.com in view of Official Notice. This rejection is respectfully traversed.

Applicants submit that the Office Action's taking of Official Notice fails to cure the deficiencies of Recommend-it.com as described above. Accordingly, claims 2, 4 and 14-17 inherit the patentable recitations of claim 1, from which they depend, and therefore, patentably distinguish over the cited art.

Claim 19 recites "the introduction destination system... registering user entry information of the introduction target system on a user list" (lines 6-8) and "the introduction target system... recognizing the registration action to the user list in the introduction destination system, based on the introduced information" (lines 13-15), and therefore, patentably distinguishes over the cited art.

In view of the above, Applicants respectfully request the rejection be withdrawn.

Conclusion

There being no further outstanding objections or rejections, it is submitted that the application is in condition for allowance. An early action to that effect is courteously solicited.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees or credits associated with filing of this response, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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